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September 23, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ***Expanding Flexible Use of the 3.7 GHz Band***
GN Docket No. 18-122
Notice of Ex Parte Communications

Dear Ms. Dortch:

On September 19, 2019, on behalf of the Wireless Internet Service Providers Association (“WISPA”), the undersigned and its outside counsel Stephen Coran met separately with: (1) Aaron Goldberger, Legal Advisor to Chairman Ajit Pai, Becky Schwartz of the Wireless Telecommunications Bureau and Jonathan Campbell of the Office of Economics and Analytics; (2) Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly; (3) Joseph Calascione, Legal Advisor to Commissioner Brendan Carr; (4) Umair Javed, Legal Advisor to Commissioner Jessica Rosenworcel; and (5) Bill Davenport, Legal Advisor to Commissioner Geoffrey Starks. The purpose of the meetings was to discuss the coordinated sharing approach that WISPA and others have proposed in the above-referenced proceeding.

In each of the meetings, we pointed out that WISPA had effectively rebutted any arguments concerning the technical feasibility of sharing among C-band earth stations and point-to-multipoint operations. We reiterated several of the important findings included in the study prepared by Prof. Jeff Reed¹ and submitted separately in the record:²

- The Reed Study considered multiple propagation analyses and relied on conservative estimates and standards-based assumptions.
- Concerns about interference in Bangladesh and Brazil are unfounded because instances of interference in those countries involved *uncoordinated* sharing.
- Co-channel sharing has been occurring in the adjacent 3650-3700 MHz band for many years pursuant to negotiated agreements between fixed wireless operators and extended C-band earth stations within the 150 km zones established under Part 90. As WISPA’s Technical Consultant pointed out, “[t]here are thousands of examples of broadband

¹ See Letter from Claude Aiken, WISPA President & CEO, et al., to Marlene H. Dortch, FCC Secretary, GN Docket No. 18-122 (filed July 15, 2019).

² See Letter from Louis Peraertz, WISPA Vice President of Policy, et al., to Marlene H. Dortch, FCC Secretary, GN Docket No. 18-122 (filed Aug. 6, 2019).



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systems operating normally within the 150 km ‘exclusion’ zones of co-channel FSS after coordination. Sometimes such operations take place within a few tens of meters. The conclusion from the Reed Study that properly-engineered broadband systems can operate within about 10 km, on average, of co-channel earth stations accordingly is verified by actual deployments. Assertions that separation distances of 150 km are needed are absurd and disproven by actual operations.”³

- Earth stations can be protected around a typical zone of about 10 km zone to enable coverage to 78 percent of the geographic area of the country and more than 80 million people.
- Any objections to the parameters used to demonstrate coordinated co-channel sharing could be addressed in the process of developing automated frequency control but cannot be a basis to disallow sharing.
- The automated frequency coordination necessary to enable sharing would be orders of magnitude simpler to develop than the Spectrum Access system for CBRS in light of the absence of shipborne and fixed military users and mobile services.

In sum, there are no technical impediments to the Commission permitting coordinated sharing among earth stations and fixed point-to-multipoint operations in the C-band.

We further indicated that those WISPA members that are fixed wireless service providers would use the C-band if the Commission were to authorize its use for point-to-multipoint operations. We referenced WISPA’s September 5, 2019 ex parte filing that included a letter from 232 WISPs, vendors and manufacturers to Congressional leadership and 36 separate letters demonstrating demand for mid-band spectrum to deliver high-speed broadband access services.

To illustrate the compelling business and deployment opportunity, we discussed the attached map of the State of Kansas showing large rural areas where co-channel sharing would be enabled through coordinated sharing. Importantly, this map does not illustrate areas where non-co-channel sharing would be permitted.

The proven technical feasibility of coordinated sharing, the demonstrated need for mid-band spectrum that WISPA members will use, and the compelling business model justify adoption of the sharing approach that WISPA and others have advocated since June 2017.

³ Reply Comments of WISPA, GN Docket No. 18-122 (filed Aug. 14, 2019), Appendix A at 11.



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Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed in ECFS in above-referenced docket. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Louis Peraertz



Louis Peraertz, Vice President of Policy

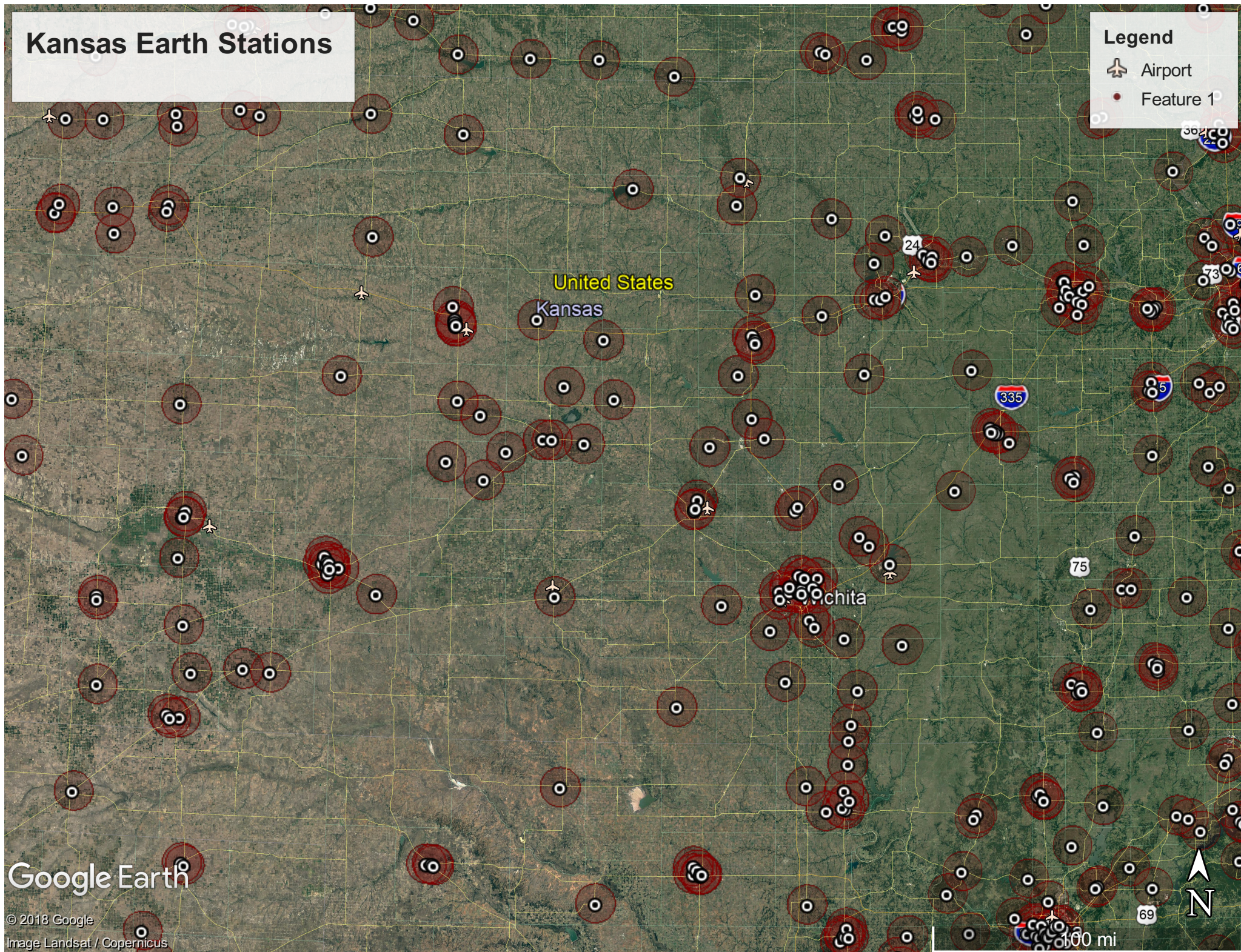
Attachment

cc: Aaron Goldberger
Erin McGrath
Joseph Calascione
Umair Javed
Bill Davenport
Becky Schwartz
Jonathan Campbell

Kansas Earth Stations

Legend

-  Airport
-  Feature 1



Google Earth